

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD., a private limited
company organized in the country of Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE
A TO THE COMPLAINT,

Defendants.

Case No.: 1:23-cv-17036

Judge: Hon. Sara L. Ellis

**PLAINTIFF’S MOTION FOR VOLUNTARY DISMISSAL OF DEFENDANT NO. 1
AND ENTRY OF FINAL JUDGMENT**

Plaintiff Roadget Business Pte. Ltd. (“Roadget”) respectfully moves to voluntarily dismiss with prejudice the remaining Defendant in this action, Defendant 1 on Schedule A to the Complaint (Foshanshinanhaiquwangniushanfuzhuangchang, d/b/a My little Cookie), pursuant to Fed. R. Civ. P. 41(a)(2), and for entry of an order of final judgment pursuant to Fed. R. Civ. P. 58(d) in the form of the proposed order attached hereto as Exhibit 1. In support of its requests, Roadget states as follows:

1. Roadget filed this action against the 27 Defendants listed on Schedule A to the Complaint on December 22, 2023. Dkt. 1.
2. This Court dismissed all Defendants except for Defendant 1 on April 29, 2024. Dkt. 86.
3. Roadget and Defendant 1 have since concluded settlement negotiations, and

Roadget has agreed to voluntarily dismiss Defendant 1 from this action. Roadget requests dismissal with prejudice under Fed. R. Civ. P. 41(a)(2) by court order.

4. Dismissal of Defendant 1 will end this action. Pursuant to Fed. R. Civ. P. 58(d), a party may request that a judgment be set out in a separate document as required by Rule 58(a).

5. Accordingly, Roadget respectfully requests dismissal of the final Defendant with prejudice and entry of an order of final judgment in the form of the proposed order attached hereto as Exhibit 1.

Dated: June 4, 2024

Respectfully submitted,

/s/ Steven J. Horowitz

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